

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

RANDY QUAID, an individual, and  
EVGENIA QUAID, an individual

*Plaintiffs,*

V.

Case No.:

**Complaint**

CRAIG GRANET, TONY DAVIS,  
REGGIE SERRANO, JAMES HEPWORTH,  
R SCOTT TURICCHI, LANNETTE TURICCHI,  
BRUCE BERMAN, SUSAN WILLIAMS,  
all individuals  
FIDELITY NATIONAL TITLE  
INSURANCE COMPANY, and  
SANTA BARBARA COUNTY

*Defendants.*

**COMPLAINT**

**I. JURISDICTION**

This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1332. Diversity jurisdiction exists in this matter as the Plaintiffs are domiciled in Vermont and not one Defendant is domiciled in Vermont. Further, the claim in the matter exceeds \$75,000.

This court has personal jurisdiction over each defendant in this matter pursuant to the Federal Rules of Civil Procedure 4. Each defendant has the requisite minimum contacts in the State of California, for this Court to exercise personal jurisdiction over each of them. See *International Shoe v. Washington*, 326 U.S. 310 (1945).

## **II. VENUE**

Venue is proper in this Court pursuant to 28 U.S.C. § 1391 because the events giving rise to the allegations in this complaint occurred in this district.

## **III. STATEMENT OF FACTS**

1. On November 25, 2019, defendants Scott Turicchi and Lannette Turicchi brought an action against the Plaintiffs to quiet title in property located at 1355 East Mountain Drive, Santa Barbara, CA.
2. The Case Number for the Civil Lawsuit that was filed in the Superior Court of California, County of Santa Barbara is 19CV06268.
3. On May 3rd, 2023 the Plaintiffs had filed a Fifth Amended Cross-Complaint in Case number 19CV06268 (“the civil case”).
4. On June 7, 2023, Reggie Serrano, in his capacity as an employee of the Santa Barbara Sheriff’s Department ILLEGALLY ACCESSED THE POLICE DATA BASE FOR AN UNOFFICIAL NON POLICE PURPOSE; a crime in the state of California, and then sent all the confidential information on the Plaintiffs to Anthony “Tony” Davis.
5. The email that Reggie Serrano sent to Anthony Davis included mug shots, warrant status, and jail inmate records of both plaintiffs.
6. On the same day, June 7, 2023, Anthony Davis circulated this information to Craig Granet, who at the time was counsel for the Turicchis in the civil case.<sup>1</sup>

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<sup>1</sup> See Exhibit A.

7. It has been confirmed by the Santa Barbara County Sheriff Department that the warrant system and due diligence is restricted **to law enforcement only**.
8. Craig Granet was attempting to defame the Quaidis in the civil case and was aided by Anthony Davis and Reggie Serrano.
9. On November 10, 2020, the Quaidis filed a Cross-Complaint in the civil case naming Fidelity National Title Insurance Company (“Fidelity”) as cross-defendants.
10. Defendant James Hepsworth represented Fidelity as their legal counsel.
11. James Hepsworth communicated and acted in concert with Reggie Serrano, Anthony Davis, and Craig Granet to elicit sealed, non-public information on the Quaidis.
12. Defendant Bruce Berman unlawfully obtained the Quaidis’ property.
13. Bruce Berman forged the Quaidis’ signature on the deed to the property.
14. Defendant Susan Williams works alongside defendant James Hepsworth.
15. Susan Williams advised and directed James Hepsworth how to answer the Quaidis’ Cross-Complaint.

#### IV. CLAIMS

The egregious, criminal, dishonest actions taken by the defendants in this matter stemmed from the frivolous lawsuit filed by the Turicchis and the Quaidis defending themselves.

Reggie Serrano opened a criminal investigation for an unauthorized purpose. Other than for a criminal purpose, Reggie Serrano committed the illegal act of gaining confidential information and circulating it. The County is required to report unauthorized access.

All defendants in this matter used unauthorized, confidential information against the Quaidis during the action over proper title to the property located at 1355 East Mountain Drive, Santa Barbara, CA.

The misuse of a police database in California is nothing new. An investigation in 2019 revealed that **hundreds** of California police officers misuse the law enforcement computer databases.<sup>2</sup> A study revealed that more than 1,000 California law enforcement officers over the past decade have been found to have misused sensitive databases that are supposed to be accessed only for legitimate investigative purposes of criminal matters.<sup>3</sup> This **crime** happened to the Quaidis during their Civil case. Santa Barbara law enforcement had no criminal investigation against the Quaidis. Further, the information they retrieved was circulated to non-law enforcement personnel for matters involving a civil lawsuit.

The Plaintiffs would like to bring to the Court's attention the filing of **criminal** charges against Assistant District Attorney Diana Teran.<sup>4</sup> The California Attorney General has accused the Assistant District Attorney of improperly downloading confidential records and then impermissibly using that data after becoming an Assistant District Attorney. In the present matter it is clear that the Quaidis have been a constant victim of this dishonesty, and lack of integrity by law enforcement and those in position of legal power in California.

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<sup>2</sup> Sam Stanton, et al., *Hundreds of California police misuse law enforcement computer databases, investigation shows*, DESERT SUN., <https://www.desertsun.com/story/news/2019/11/13/california-police-misuse-law-enforcement-databases-computers/2509747001/> (Nov. 13, 2019).

<sup>3</sup> *Id.*

<sup>4</sup> James Queally, et al., *Top advisor to Los Angeles D.A. Gascón is charged with illegal use of confidential police records*, LOS ANGELES TIMES, <https://www.latimes.com/california/story/2024-04-24/top-advisor-to-l-a-county-district-attorney-faces-criminal-charges-accused-of-improper-access-of-confidential-police-records> (Apr. 24, 2024).

**COUNT 1: UNAUTHORIZED FURNISHING OF CRIMINAL HISTORY  
INFORMATION**

California Penal Code §11142 makes it unlawful for any person authorized by law to receive a record or information obtained from a record who knowingly furnishes the record or information to a person who is not authorized by law to receive the record or information.

In the civil case referenced above, information on both Plaintiffs was obtained through the Santa Barbara Sheriff Department's warrant system. The warrant system and due diligence is not permitted to be released to the public. Plainly stated, it is for law enforcement only. Therefore, circulating this information to Craig Granet, James Hepsworth, Susan Williams, and other defendants was a violation of California's Penal Code.

**COUNT 2: CONSPIRACY**

California Penal Code §182(a)(1) makes it a crime for any two or more persons conspiring to commit any crime. Crime of conspiracy has four elements: (1) the existence of an agreement between at least two persons; (2) the specific intent to agree to commit an offense; (3) the specific intent to commit the offense that is the object of the agreement; and (4) an overt act in furtherance of the conspiracy, which may be committed by any conspirator.

Direct lines of communication existed between defendants Reggie Serrano, Anthony Davis, Susan Williams and Craig Granet to circulate the private criminal record information of the Quaid. The communication between these members, which is documented, explicitly references the Quaid. Each party intended to use the criminal information of the Quaid against them throughout the civil case. As stated above, it was a crime to withdraw information on the Quaid from the Santa Barbara Sheriff Department's warrant system and share that information

with non-law enforcement personnel. Each party took the overt act of spreading the confidential information.

**COUNT 3: FORGERY AGAINST BRUCE BERMAN**

California Penal Code § 473 penalizes the crime of forgery. Forgery consists either in the false making or alteration of a document without authority or the uttering, making use, of such a document with the intent to defraud. *People v. Wheeler*, 127 Cal.App.4th 873 (Ct. App. 2005).

Bruce Berman never had legal or equitable title to the Quaid's property located at 1355 East Mountain Drive, Santa Barbara, CA ("the property"). In the process of selling the property to the Turicchis, Berman committed forgery in signing the deed to the property.

**V. PRAYER FOR RELIEF**

Based on the above allegations, the Plaintiffs respectfully requests that the Court enter judgment in favor of the Plaintiffs and against the Defendants on all claims.

Further, Plaintiffs request that the Court award Plaintiffs \$1,000,000 (One-million dollars).

Dated: April 26, 2024

Respectfully Submitted,

/s/ John M. Pierce

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Attorney for the *Plaintiffs*.

CERTIFICATE OF SERVICE

I hereby certify that this document is being filed on this April 26, 2024, with the Clerk of the Court by using the District Court of the Central Judicial District, State of California's CM/ECF system. All attorneys of record will receive an electronic copy.

/s/ John M. Pierce

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